

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

CHARLES D. WILSON,	)
	)
Plaintiff,	)
	) CIVIL ACTION NO. 05-122E
v.	)
	)
MOTION CONTROL INDUSTRIES,	)
DIVISION OF CARLISLE CORPORATION,	)
RETIREMENT PLAN FOR BARGAINING	)
UNIT EMPLOYEES OF MOTION CONTROL	) Senior Judge
INDUSTRIES, DIVISION OF CARLISLE	) Maurice B. Cohill, Jr.
CORPORATION,	)
	)
Defendants.	)

**CONSENT MOTION TO AMEND CASE MANAGEMENT ORDER**

AND NOW, come the defendants, by and through their counsel, Knox McLaughlin Gornall and Sennett, P.C., and file the following Consent Motion to Amend Case Management Order:

1. This is the first request to amend the Case Management Order
2. The defendants have served written discovery, the responses to which are expected within one week.
3. Based upon information provided to defendants from plaintiff, defendants have identified one area of inquiry related to phase one fact discovery that requires the deposition of the plaintiff.
4. The defendants require an additional thirty days of discovery to complete this deposition.
5. This extension would result in discovery being completed by August 3, 2006, with motions due on September 1, 2006.
6. Counsel for the plaintiff has consented to this motion.

WHEREFORE, the defendants respectfully request that this Court enter an Order amending the Case Management Order extending the phase I fact discovery until August 3, 2006 and adjusting all other deadlines accordingly and as identified in the attached Proposed Order.

Respectfully submitted,

KNOX McLAUGHLIN GORNALL &  
SENNETT, P.C.

BY: /s/ Richard A. Lanzillo

Richard A. Lanzillo  
Neal R. Devlin  
120 West Tenth Street  
Erie, PA 16501-1461  
(814) 459-2800

Attorneys for defendants, Motion Control  
Industries, Division of Carlisle Corporation,  
and Retirement Plan for Bargaining Unit  
Employees of Motion Control Industries  
Motion Control